

February 5, 2003

Re: Truck Accessories Group, Inc. 039-15858-00109

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Truck Accessories Group, Inc.,
dba 20th Century Fiberglass Plant #4
28722 Jami Street,
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-15858-00109	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 5, 2003

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary pickup truck cover surface coating operation.

Responsible Official: Michael Stephenson
Source Address: 28722 Jami Street, Elkhart, Indiana, 46514
Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46514
SIC Code: 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions unit and pollution control device:

One (1) paint/clear coat booth and its associated drying booth and cleanup operations, with two (2) HVLP spray guns, identified as Paint/Clear, with a maximum capacity to paint 263.29 pounds of product per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks, and the emissions from the drying booth being exhausted to one (1) stack.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

and

- (c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.7 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request.

If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

One (1) paint/clear coat booth and its associated drying booth and cleanup operations, with two (2) HVLP spray guns, identified as Paint/Clear, with a maximum capacity to paint 263.29 pounds of product per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks, and the emissions from the drying booth being exhausted to one (1) stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC), Emission Limit [326 IAC 8-1-6]

The input volatile organic compounds (VOC) from the Paint/Clear booth shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall render 326 IAC 8-1-6 not applicable in this case.

D.1.2 Particulate Matter (PM) Overspray Requirements [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray from the Paint/Clear booth shall be controlled by a dry particulate filter, waterwash, or equivalent control system.

The owner or operator shall operate and maintain the control device in accordance with the manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the owner or operator shall:

(a) inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground, or
- (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

and

(b) maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground

D.1.3 Particulate Matter (PM) Overspray, Additional Operating Requirements

The dry filters for PM control shall be in operation at all times when Paint/Clear booth is in operation.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the emission units and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 VOC Emission Limit

To determine compliance with the VOC limit of Condition D.1.1, the owner or operator shall on a monthly basis:

- (a) draft a list of all coatings, additives, and solvents used at the Paint/Clear booth that contain VOCs;
- (b) determine the following for each coating, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data supplied by the coating manufacturer and the applicable material volatile organic compound usage for the most recent month:
 - (1) the amount and VOC content, and
 - (2) the VOC emissions;
- (c) the sum total coating, additive, and solvent VOC emissions;
- (d) the sum total VOC emissions from the previous 11 months; and
- (e) the 12 month rolling total VOC emissions.

The IDEM, OAQ, reserves the authority to require compliance determination using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 and material volatile organic compound usage.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 VOC Emission Limit

To demonstrate compliance with the VOC emission limit of Condition D.1.1, the owner or operator shall record the information determined in Condition D.1.6.

D.1.8 Particulate Matter (PM) Overspray Requirements

To demonstrate compliance with the requirements of Condition D.1.2, the owner or operator shall perform:

- (a) Weekly inspections of the dry filters to verify their placement, integrity and particle loading. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit;
- (b) Monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall

contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit;

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan;

and

- (d) Weekly visible emission notations of the Paint/Clear booth stack exhaust. Said visible emission notations shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (1) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (2) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (3) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (4) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with the VOC limit of Condition D.1.1, the owner or operator shall maintain the records of the information required in Condition D.1.7. Said records shall be complete and sufficient to establish compliance with the VOC emission limit of Condition D.1.1.
- (b) To document compliance with PM overspray requirements of Condition D.1.2, the owner or operator shall maintain a log of:
 - (1) the daily and weekly inspections, those additional inspections prescribed by the Preventive Maintenance Plan, and the visible emission notations required in Condition D.1.8, and
 - (2) all actions taken as a result of the requirements of Condition D.1.2.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with the VOC limit of Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of

this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Minor Source Operating Permit Quarterly Report

Source Name: Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
Source Address: 28722 Jami Street, Elkhart, Indiana 46514
Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46514
Permit No.: 039-15858-00109
Facility: Paint/Clear Booth
Parameter: VOC Emissions
Limit/Determination: Less than 25 Tons VOC per 12 consecutive month period, with compliance determined at the end of each month

Quarter: _____ **Year:** _____

Month	(1) Tons VOC This Month	(2) Tons VOC Past 11 Months	(1) + (2) Rolling Total VOC Emissions (Tons)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

Company Name:	Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
Address:	28722 Jami Street
City:	Elkhart, Indiana 46514
Phone #:	
MSOP #:	039-15858-00109

Authorized Individual (typed):
Title:
Signature:
Date:

[illegible]

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the
Technical Support Document for a Source Minor Source Operating Permit (MSOP)

Source Name: Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
Source Location: 28722 Jami Street, Elkhart, Indiana 46514
County: Elkhart
SIC Code: 3792
MSOP No.: 039-15858-00109
Permit Reviewer: SDF

On December 12, 2002, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4 had applied for a Minor Source Operating Permit to operate their existing source less the resin and gel coat equipment that was permanently damaged in a fire and removed. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 5, 2003, TechServ Environmental, Inc., for Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4, submitted comments on the proposed MSOP. The summary of the comments and corresponding responses is as follows:

1. Comment 1:

The facility name change was incorrectly submitted. Please add the term "20th Century" instead of "Century".

Response 1:

The source name shall be changed as requested.

(a) The cover page source title shall be changed as follows:

**Truck Accessories Group, Inc.,
dba 20th Century Fiberglass Plant #4
28722 Jami Street,
Elkhart, Indiana 46517**

(b) The permit page header shall be changed as follows:

Truck Accessories Group, Inc., dba 20th Century Fiberglass
Elkhart, Indiana
Permit Reviewer: SDF

Page 1 of 23
039-15858-00109

(c) Source name of the quarterly report form shall be changed as follows:

Source Name: Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4

(d) The source name references of the annual notification shall be changed as follows:

(i) Company Name: Truck Accessories Group, Inc., dba **20th** Century Fiberglass Plant #4

(ii) I hereby certify that Truck Accessories Group, Inc., dba **20th** Century Fiberglass Plant #4 is

☐ still in operation.

☐ no longer in operation.

(iii) I hereby certify that Truck Accessories Group, Inc., dba **20th** Century Fiberglass Plant #4 is

☐ in compliance with the requirements of MSOP 039-15858-00109.

☐ not in compliance with the requirements of MSOP 039-15858-00109.

2. Comment 2:

Please correct the zip code to read 46514.

Response 2:

The zip code shall be changed as requested.

(a) The zip code listed in Condition A.1 shall be changed as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary pickup truck cover surface coating operation.

Responsible Official: Michael Stephenson

Source Address: 28722 Jami Street, Elkhart, Indiana, 465174

Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 465174

.....

(b) The zip codes listed in the quarterly report shall be changed as follows:

Source Address: 28722 Jami Street, Elkhart, Indiana 465174

Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 465174

(c) The zip code listed in the annual notification shall be changed as follows:

City: Elkhart, Indiana 465174

3. Comment 3:

Section B of the MSOP seems to pertain to conditions of initial construction. More specifically, Section B.6 requires the submission of an "Affidavit of Construction". Since the source has already been constructed and is currently operated, please advise if the requirement still applies.

Response 3:

The existing source approval before the modification was a Part 70 permit. Removing the equipment under this modification reduced the source unrestricted potential to emit (UPTE) to Minor Source Operating Permit (MSOP) levels which required drafting a MSOP permit for the source. The Section B conditions referenced are mandatory conditions that are to be placed in all permits drafted. If the source has complied with the requirements in previous approvals, the source can consider the requirement satisfied and does not have to submit the specified affidavit.

4. Comment 4:

In Section D.1.4, please remove the reference to the gel coat and chop operations.

Response 4:

Since the specified gel coat and chop operations no longer exist, the associated references shall be removed.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the emission units** ~~Paint/Clear, Gel Coat Operation, and Chop Operation~~ and any control devices.

5. Comment 5:

Section D.1.6(b)(2) states a requires the owner or operator to maintain a log of the dates of use. There are more than 100 product combinations that can be used and to maintain a daily log by each component seems rather onerous. The products are inventoried on a monthly basis and cross verified by vendor purchase records monthly. Please remove this requirement from the permit or entertain some alternative requirement (e.g. a log of the dates of production).

Response 5:

Condition D.1.6 requires the owner or operator to, on a monthly basis, draft a list of the coatings, additives, and solvents used, to determine the amount of each coating used, the VOC content, and the monthly emissions.

Part (b)(2) was included to ensure that the applicable month is listed in the records determined for that month. Since the condition requires the owner or operator to keep the records on a monthly basis, it can be assumed that the source would list the applicable month anyhow and that the requirement of Part (b)(2) can be removed.

Therefore, Part (b)(2) shall be removed.

D.1.6 VOC Emission Limit

To determine compliance with the VOC limit of Condition D.1.1, the owner or operator shall on a monthly basis:

- (a) draft a list of all coatings, additives, and solvents used at the Paint/Clear booth that contain VOCs;

(b) determine the following for each coating, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data supplied by the coating manufacturer and the applicable material volatile organic compound usage for the most recent month:

- (1) the amount and VOC content, **and**
- (2) ~~a log of the dates of use, and~~
- (3) the VOC emissions;

6. Comment 6:

Section D.1.9(b)(1) discusses the documenting the “daily” overspray observations, inspections, and visible emission notations. Please remove the term “daily” as Section D.1.8 has no daily monitoring requirements.

Response 6:

Upon review of Condition D.1.8, it is determined that there are no “daily” observations. Therefore, the “daily” observation requirements listed in Condition D.1.9(b)(1) shall be removed.

D.1.9 Record Keeping Requirements

- (a) To document compliance with the VOC limit of Condition D.1.1, the owner or operator shall maintain the records of the information required in Condition D.1.7. Said records shall be complete and sufficient to establish compliance with the VOC emission limit of Condition D.1.1.
- (b) To document compliance with PM overspray requirements of Condition D.1.2, the owner or operator shall maintain a log of:
 - (1) ~~daily overspray observations~~, the daily and weekly inspections, those additional inspections prescribed by the Preventive Maintenance Plan, and ~~the daily stack exhaust~~ visible emission notations required in Condition D.1.8, and
 - (2) all actions taken as a result of the requirements of Condition D.1.2.

7. Comment 7:

In the Technical Support Document, Page 2, the VOC potential to emit seems to be miscalculated because the gal/unit should be 0.034, not 0.34. Please revise the PTE for the source.

Response 7:

Upon review of the application and the technical support document, it is determined that the wrong gal/unit value was used when determining the MEK emissions. While the Office of Air Quality does not make changes to the Technical Support Document, the following calculations shall be performed to re-establish the source emissions.

(a) VOC UPTE:

The following calculations determine the source VOC emissions based on the worst case coating combination, the respective coating properties, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{lb/gal} * \text{Fraction VOC} * \text{gal/unit} * \text{unit/hr} * 8760\text{hr/yr} * 1/2000 \text{ ton/lb}$$

Coating	lb/gal	Fraction VOC	gal/unit	unit/hr	tons/yr
Paint	7.34	0.76	0.34	3.0	24.90
Clearcoat	8.36	0.51	0.34	3.0	19.04
MEK	6.76	1.00	0.034	3.0	3.02
Total					46.96

(b) Potential To Emit:

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/year)
PM	5.23
PM-10	5.23
SO ₂	neg.
VOC	46.96
CO	neg.
NO _x	neg.

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/year)
Worst Case Single HAP	8.45
Combined HAPs	17.17

Since the VOC UPTE exceeds the low end applicable level of 25 tons per year, but are less than the upper applicable level of 100 tons per year, and no single and combined HAP UPTE exceeds the respective applicable levels of 10 and 25 tons per year, this source shall be permitted via a Minor Source Operating Permit (MSOP) pursuant to 326 IAC 2-6.1-2 and 326 IAC 2-5.1-3(a)(1)(D) and (E).

(c) Source Status

Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	0.26	0.26	neg.	neg.	46.96	neg.	8.45	17.17
PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source is not a Title V major stationary source because the VOC emissions do not exceed the applicable level of 100 tons/yr and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons/yr.

Adjusting the source MEK emission estimates does reduce the source VOC UPTE, but does not affect the source status or proposed permit conditions. Thus, no other changes shall be made.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Truck Accessories Group, Inc., dba Century Fiberglass Plant #4
Source Location:	28722 Jami Street, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3792
Minor Source Operating Permit No.:	039-15858-00109
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a Minor Source Operating Permit (MSOP) permit application from Truck Accessories Group, Inc., relating to the operation of their existing surface coating operation.

Source Definition

This company which applies surface coatings to pickup truck covers consists of one (1) plant (Plant 4).

Plant 1 (plant ID 039-00076) is located at 1131 D.I. Drive, Elkhart, Indiana 46517, and is also owned by Truck Accessory Group's parent company, and has the same SIC code. Plant 1 is located about 0.4 miles away from Plant 4. Since there are no supporting activities between Plant 4 and Plant 1 they are considered two (2) separate sources.

Note: According to Truck Accessory Group, Inc. and the inspector, Greg Wingstrom, "Plant 2" and "Plant 3" denote building numbers for buildings that perform activities that have already been accounted for in the Plant 1 application.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

One (1) paint/clear coat booth and its associated drying booth and cleanup operations, with two (2) HVLP spray guns, identified as Paint/Clear, with a maximum capacity to paint 263.29 pounds of product per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks, and the emissions from the drying booth being exhausted to one (1) stack.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This source has been operating under Part 70 permit 103-7638-00021, issued on June 30, 1999.

On March 3, 2000, a fire destroyed the lamination operation (all resin and gelcoat equipment). The lamination operation will not be replaced. Therefore, Truck Accessories Group, Inc. has submitted a request to remove the lamination operation from their permit.

The source emissions after the modification reduce the potential to emit to Minor Source Operating Permit Levels (MSOP).

Therefore, this proposed Minor Source Operating Permit shall be the source operating permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit be approved. This recommendation is based on the following facts and conditions.

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

The emissions generated by the equipment of the proposed modification are VOC and HAP surface coating emissions, and PM/PM10 overspray emissions.

(1) Unrestricted Potential to Emit (UPTE):

The following calculations determine the UPTE due to the proposed modification.

(a) VOC UPTE:

The following calculations determine the source VOC emissions based on the worst case coating combination, the respective coating properties, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{lb/gal} * \text{Fraction VOC} * \text{gal/unit} * \text{unit/hr} * 8760\text{hr/yr} * 1/2000 \text{ ton/lb}$$

Coating	lb/gal	Fraction VOC	gal/unit	unit/hr	tons/yr
Paint	7.34	0.76	0.34	3.0	24.90
Clearcoat	8.36	0.51	0.34	3.0	19.04
MEK	6.76	1.00	0.34	3.0	30.20
Total					74.14

(b) HAP UPTE:

The following calculations determine the source single and combined HAP emissions based on the worst case hourly rates, emissions before controls, and 8760 hours of operation.

$$\text{Tons/yr} = \text{lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$$

HAP	lb/hr	tons/yr
Ethyl Benzene	0.24	1.05
Hex-Diisocyanate	neg.	neg.
MEK	0.68	2.98
MIBK	0.15	0.66
Toluene	0.92	4.03
Xylene	1.93	8.45
Total		17.17

(b) PM/PM10 UPTE:

The following calculations determine the source PM and PM10 overspray UPTE based on the worst case coating combination, the coating properties, emissions before controls, and 8760 hours of operation.

$$\text{Tons PM/yr} = \text{lb/gal} * (1 - \text{Fraction VOC}) * (1 - \text{TE}) * \text{gal/unit} * \text{unit/hr} * 8760\text{hr/yr} * 1/2000 \text{ ton/lb}$$

Coating	lb/gal	Fraction VOC	Transfer Efficiency	gal/unit	unit/hr	tons PM/yr
Paint	7.34	0.76	0.80	0.34	3.0	1.57
Clearcoat	8.36	0.51	0.80	0.34	3.0	3.66
MEK	6.76	1.00	0.80	0.34	3.0	0.00
Total						5.23*

* PM10 is determined to be equal to PM in this case.

Emissions After Controls:

The PM and PM10 emissions are controlled by a dry filter system with a design control efficiency of 95%. All other emissions are uncontrolled.

The following calculations determine the PM emissions after controls based on the estimated PM emissions before controls and the design control efficiency of 95%.

$$\text{Tons/yr} = 5.23 * (1 - 0.95) = 0.26^*$$

* PM10 is determined to be equal to PM in this case.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/year)
PM	5.23
PM-10	5.23
SO ₂	neg.
VOC	74.14
CO	neg.
NO _x	neg.

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/year)
Worst Case Single HAP	8.45
Combined HAPs	17.17

Since the VOC UPTE exceeds the low end applicable level of 25 tons per year, but are less than the upper applicable level of 100 tons per year, and no single and combined HAP UPTE exceeds the respective applicable levels of 10 and 25 tons per year, this source shall be permitted via a Minor Source Operating Permit (MSOP) pursuant to 326 IAC 2-6.1-2 and 326 IAC 2-5.1-3(a)(1)(D) and (E).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.

- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	0.26	0.26	neg.	neg.	74.14	neg.	8.45	17.17

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This source is not a Title V major stationary source because the VOC emissions do not exceed the applicable level of 100 tons/yr and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons/yr.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed source.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Parts 61 and 63) that apply to the proposed source.

State Rule Applicability

(a) Entire Source Rules:

- (1) 326 IAC 1-6-3 (Preventive Maintenance Plan):

The proposed source is required to have a preventive maintenance plan for the emission units and control devices of the source.

(2) 326 IAC 2-2 (Prevention of Significant Deterioration):

This source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.

(3) 326 IAC 2-4.1 (HAP Major Sources)

This source is not subject to the requirements of 326 IAC 2-4.1 because the single and combined HAP PTE are less than their respective applicable levels of 10 and 25 tons per year.

(4) 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source VOC PTE exceeds the Elkhart County applicable level of 10 tons per year.

(5) 326 IAC 5-1-2 (Opacity Limitations)

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

(b) Individual Unit Rules:

(1) 326 IAC 6-3 :

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray from the Paint/Clear booth shall be controlled by a dry particulate filter, waterwash, or equivalent control system.

The owner or operator shall operate and maintain the control device in accordance with the manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the owner or operator shall:

(a) inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground, or
- (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

and

(b) maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground.

The records required in this Condition shall be maintained for a minimum period of five (5) years.

(2) 326 IAC 8-1-6:

Since there are no other Article 8 rules that apply and the VOC UPTE from the proposed surface coating operation is greater than the applicable level of 25 tons/yr, 326 IAC 8-1-6 applies.

However, to avoid the requirements of 326 IAC 8-1-6, Truck Accessories Group, Inc. has agreed to limit the input VOCs to less than 25 tons per year.

Conclusion

The source shall be operated according to the provisions of proposed MSOP 039-15858-00109.